AIR QUALITY FULL COMPLIANCE EVALUATION REPORT

AS 46.14.515

Stationary Source Evaluated:	Alpine Central Processing Facility
Owner/Operator:	ConocoPhillips Alaska, Inc.
Air Quality Permit:	AQ0489TVP02 Rev. 1 AQ0489TVP02 Rev. 2 (effective 9/11/18) AQ0489MSS07 (rescinded 2/14/18) AQ0489MSS08 (effective 2/14/18)
Location:	70.34408°N, -150.923654°W Section 32, Township 12N, Rage 5E Umiat Meridian
Period Covered by Evaluation:	June 16, 2017 through February 28, 2019
Date of On-Site Visit:	May 17, 2018
Date of Report:	March 1, 2019
Evaluator(s):	Breanna Howard, Environmental Program Specialist
Facility Representative(s):	Laura Perry, Coordinator – Air Quality Sam Widmer & Lynn DeGeorge, Western North Slope Field Environmental Coordinators
Weather Condition at Time of On-Site Visit:	Overcast, Approximately 31° F

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I. Evaluation Summary

The Alaska Department of Environmental Conservation (ADEC) conducted an air quality full compliance evaluation (FCE) of the Permittee stationary source covering the period June 16, 2017 through February 28, 2019. The purpose of the evaluation was to determine if the stationary source was in compliance with terms and conditions of Air Quality Operating Permit No. AQ0489TVP02 Rev. 2, AQ0489TVP02 Rev.1, AQ0489MSS07, AQ0489MSS08 and Alaska Air Quality Control Regulations. This FCE includes a comprehensive review of records and files and was conducted with an on-site visit.

Based on the scope of this evaluation, the stationary source was determined to be out of compliance with Conditions 14.2, 15.2(c), 16.2(b), 19.2, 20.1, 36.1, 84.1(c)(i), and 95.

II. Stationary Source Description

ConocoPhillips Alaska, Inc. is the Permittee and Operator for the Alpine Central Processing Facility operating permit. Alpine receives three-phase crude oil from the surrounding production pads where it is separated into crude oil for sale, produced water for re-injection, and natural gas for use as fuel and for re-injection. Within Alpine, there is equipment that can be used for enhanced oil recovery (EOR module) to produce liquids that may be used as miscible injectants. Permit No. AQ0109TVP03 states that this equipment has been dismantled and is no longer in use.

The Alpine Development is comprised of oil & gas operations located at the Central Processing Facility pad (also known as CD-1) and at well pads CD-2, CD-3 and CD-4. Emission units of various types are permanently located at each of these locations. Additionally, temporary "portable oil and gas operations" as well as "well servicing activities" occur at these locations. Permanent and temporary operations at these locations are considered to be part of a single stationary source, known as the Alpine Stationary Source (Alpine), for purposes of determining classification under 18 AAC 50.326(a) and applicability with the modification requirements of 18 AAC 50.302.

Air pollutant emitting activities at Alpine are governed by multiple operating permits as allowed under AS 46.14.190(b). This permit governs the aggregated permanent emitting activities at the Alpine Central Processing Facility and well pad (i.e., CD-1) and at other Alpine Development well pads CD-2, CD-3 and CD-4, including well servicing activities and portable flare operations. Additional operating permits address non-temporary construction activities and temporary transportable oil and gas operations conducted by various drill rigs.

The standard industrial classification (SIC) code for this stationary source is 1311 - Oil and Gas Extraction / Crude Petroleum and Natural Gas. The North American Industry Classification System (NAICS) code is 211111 - Crude Petroleum and Natural Gas Extraction.

III. Significant Emission Units

The table below identifies the significant emission units at the stationary source as authorized under the permit.

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EU ID	Tag No.	Emission Unit Description	Rating/Size	Commenced Construction /Startup/ Modification Date[1]
Gas Turbines				
1	CF-C-33012-TB	N-P MS5382 Injection Turbine (Gas-Fired) (C1)	38,000 Hp (ISO)	10/18/00
2	CF-G-70001-TB	N-P PG5371 Generator Turbine (Gas-Fired) (E1)	26,410 kW (ISO)	09/03/00
3	CF-G-70002-TB	N-P PGT10+Generator Turbine (Gas-Fired) (E2)	11,270 kW (ISO)	02/23/01
4	CF-G-70300-TB	Solar Taurus 60S (Dual-Fired) (S1)	5.5 MW	3/10/05[8]
5	CF-G-70350-TB	Solar Taurus 60S (Gas-Fired) (S2)	5.5 MW	3/8/05[8]
Heaters				
106	CF-H-31003A	Born Crude Heater (Gas-Fired)	65.6 MMBtu/hr (Heat input, LHV)	10/14/00
107	CF-H-31003B	Born Crude Heater (Gas-Fired)	65.6 MMBtu/hr (Heat input, LHV)	10/14/00
108	CF-H-64004	Thermoflux UHM Heater (Dual Fired)	20.0 MMBtu/hr (Heat input, LHV)	08/27/00
109	CF-H-64005	Thermoflux UHM Heater (Dual Fired)	20.0 MMBtu/hr (Heat input, LHV)	09/05/00
110	CF-U-68007-H1	ACX3 Hot Oil Heater (Gas-Fired)	36.75 MMBtu/hr (Heat input, LHV [estimated])	*2/17/05*[9]
Engines				
211	CF-G-70008	Cummins KTTA50-G2 V-16 Pad Back-up Generator (E8)	1,500 kW	*8/24/05*
212	CF-G-70375	Detroit Diesel 12V2000-R1237k35 Black Start Generator (S4) for the Solar Taurus Dual Fired Turbine (S1) tag no. CF-G-70300-TB	600 kW	5/12/05
Incinerators				
313	CF-K-59701	EnerWaste BOS 3.5T Waste Incinerator with supplemental gas-fired burners: Primary Burner Secondary Burner	292 lb/hr 1.36 MMBtu/hr 2.20 MMBtu/hr	01/31/01[4]
314	CF-K-59702	EnerWaste BOS 3.5T Waste Incinerator with supplemental gas-fired burners: Primary Burner Secondary Burner	292 lb/hr 1.36 MMBtu/hr 2.20 MMBtu/hr	5/24/00[4]

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EU ID	Tag No.	Emission Unit Description	Rating/Size	Commenced Construction /Startup/ Modification Date[1]
Flares				
415	CF-X-35002	Corona HP Flare	261 MMscf/day[2, 3] (Max. flaring capacity)	10/17/00
416	CF-X-35012	Corona LP Flare	212 MMscf/day[2, 3] (Max. flaring capacity)	10/18/00
417		Portable Flares	3.9 MMscfd limited to 130 MMscf/year	
Well Pad Heaters				
518	CD2-H-30001	CD-2 OPS Production Heater (Gas-Fired)	20.0 MMBtu/hr (Heat input, LHV)	10/04/01
519	CD3-U-303007-H1	CD-3 GTS Energy Production Heater (Gas-Fired)	20.0 MMBtu/hr (Heat input, LHV)	*3/9/05*
520	CD4-U-304007-H1	CD-4 GTS Energy Production Heater (Gas-Fired)	20.0 MMBtu/hr (Heat input, LHV)	*3/9/05*
Well Pad Engines				
621	CD3-U-703001-G1	CD-3 Caterpillar 3412E Standby Generator (Liquid Fuel-Fired)	600 kW (maximum) (896 hp)	*8/24/05*[10]
622	CD3-U-703201-G1	CD-3 Caterpillar C27 Standby Generator (Liquid Fuel-Fired; Model Year 2011; EPA Tier 4i)	800 kW (1,207 hp)	4/25/12
Generic Well Servicing Equipment and Well Frac Units (Portable Emission Units)[5]				
742		Well Servicing Equipment[6]	varies	
743		Well Frac Unit(s)[7] - IC engines	varies	
Other Equipment				
839	MP1	Mud Plant Glycol Boiler	1.3 MMBtu/hr	~2000[11]
842	CF-U-33001-V2	TEG Contactor (Glycol Dehydrator) Process Vent	---	~2000[11]
NSPS-Affected Storage Tanks				
944	CF-T-61001	AHF Tank	525 m^3	Prior to July 1984
945	CF-T-51001	Methanol Tank	238 m^3	1998
Portable Storage Tanks				
946		Temporary Crude Oil Storage Tank(s)	varies	

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EU ID	Tag No.	Emission Unit Description	Rating/Size	Commenced Construction /Startup/ Modification Date[1]
NESHAP-Affected Gasoline Dispensing Facility (4 Storage Tanks)				
947	CF-T-76072 TKFA-0501-25 AP-T-76222 TKFA-0201-25	stationary skid-mounted skid-mounted trailer-mounted	5,000 gallons 500 gallons 500 gallons 200 gallons	2003 2001 2005 2001

Notes for Table A

1 The dates provided are startup dates for each unit, unless a unit has been modified as defined by AS 46.14.990. In such cases, the most recent modification date is provided. If the unit has not yet started operation, the date shown is the date construction commenced on the unit. Commenced construction dates are displayed in italic font.
2 Pilot and purge gas operate 8,760 hr/yr on fuel gas.
3 Maximum process gas flaring capacity from vendor.
4 Commenced construction July 27, 1998 for this unit.
5 Intermittently used oilfield support equipment does not consume increment. See Policy 04.02.105. The engines in this group are non-road engines.
6 Generic well servicing equipment as defined in 18 AAC 50.990, except the frac unit. Includes only those units permanently associated with the well servicing units.
7 The well frac unit(s) are limited to IC engines.
8 Commenced construction November 13, 2003 for this unit.
9 Commenced operation November 18, 2006 for this unit.
10 Manufactured November 11, 2005.
11- Exact construction date unknown. Units were constructed approximately 2000.

Table A – Emission Unit Inventory (with no MR&R)

Tag No.	Emission Unit Description	Rating/Size	Startup/ Modification Date[1]
Notable Equipment (Portable Units)			
AM-1001	Snowmelter[2]	4.15 MMBtu/hr (Heat input, LHV) 20 Hp engine	2001
Decommissioned-in-Place Units			
BP1 (EU ID 840[3])	Bulk Plant Detroit 6063-GK35 Power	300 kW	---
BP2 (EU ID 841[3])	Bulk Plant Detroit 6043-GK35 Power	160 kW	---

Notes for Table B

1- The date provided is the startup date for the unit, unless modified as defined by AS 46.14.990. In such cases, the most recent modification date is provided.
2- The snowmelter includes a 4.15 MMBtu/hr heater and contains a 20 Hp engine. This unit is an insignificant emission unit based on historical actual emissions. The 20 Hp engine portion of the unit is a non-road engine.
3 These two units are disabled and no longer in service. In the event that CPAI returns either unit to service at Alpine, CPAI will submit a contemporaneous off-permit change notice and comply with the applicable minor permitting operational restrictions as laid out in Permit No. AQ0489MSS06.

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On January 3, 2019, CPAI provided an updated Emission Inventory list.

IV. Compliance Background

The 2017 FCE covered the period September 16, 2015 to June 15, 2017. CPAI was found to be out of compliance with Conditions 3(b), 11, 19.3, 25, 27.1, 65, 69.2, 71.1, 73 of Permit No. AQ0489TVP01 Rev. 5 and Conditions 2.2, 4.1, 5.1(f), 14.6(a), 14.8(b), 15.2(c), 15.2(d)(iii), 15.8(b)(iii), 16.2(b), 16.2(c)(iii), 18, 18.1, 20.1, 35.1, 39.1, 84.1(c)(i), 85.1, 85.2, 85.3, and 95 of Permit No. AQ0489TVP02. On July 16, 2017 the Department sent CPAI a compliance letter with action items. On June 23, 2017 the Department and CPAI met to discuss violations and action items associated with the 2017 FCE. On June 25, 2017 CPAI responded with the requested action items. On July 11, 2017, Compliance Case No. 17-R0687-37-0001, AT Case No. 4005, was closed with no further actions.

The 2015 FCE covered the period November 13, 2013 to September 15, 2015. CPAI was found out of compliance with Conditions 3(b), 30.6(a), and 73 of Permit No. AQ0489TVP01 Rev 5. The Department requested an action item with regards to Condition 3(b). On October 6, 2015, CPAI provided the information in the requested action item. On July 26, 2016, Compliance Case No. 15-R0717-37-0001, AT Case No. 3210, was closed with no further action.

V. Federal Standards (NSPS/NESHAP)

A. NSPS Subpart A

1. Notification

For any affected facility or existing facility regulated under NSPS requirements in 40 C.F.R. 60, the Permittee shall furnish the Department and EPA written or electronic notification of the requirements listed in 28.1 through 28.4.

Findings: In the 2017 Annual Compliance Certification (ACC), CPAI stated that this requirement was not triggered and no reporting was required during the evaluation period.

In Compliance

2. Startup, Shutdown, & Malfunction Requirements

The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of any of EU IDs 1 through 5, any malfunctions of associated air-pollution control equipment, or any periods during which a continuous monitoring system or monitoring device for any of EU IDs 1 through 5 is inoperative.

Finding: In the 2017 ACC, CPAI reported continuous compliance with this requirement.

In Compliance

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3. **Excess Emissions and Monitoring system Performance Report (EEMSP)**
Except as provided for in Condition 39.3a(iii), the Permittee shall submit excess emissions and monitoring systems performance (EEMSP) reports as required by this condition and/or summary report forms as required by Condition 31 for EU IDs 1 through 5 to the Department and EPA semi-annually, postmarked by the 30th day following the end of each six-month period. Report excess emissions for all periods of unit operation, including startup, shutdown, and malfunction.

Finding: EU ID 4 is dual-fired (fuel gas and liquid gas) and is the only unit subject to this requirement. During the evaluation period, CPAI did not have excess emissions durations greater than or equal to one percent of the total operating time or CMS downtime greater than or equal to five percent of the total operating time for EU ID 4's fuel sulfur content. Therefore, no EEMSP reports were required under NSPS Subpart A.

In Compliance

4. **Summary Report Form**
Except as provided for in Condition 39.3a(iii), the Permittee shall submit to the Department and to EPA one "summary report form" semiannually, postmarked by the 30th day following the end of each six-month period, containing the information and in the format shown in Figure 1 of 40 C.F.R. 60.727 unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored for EU IDs 1 through 5. The report shall be submitted as required in 31.1 and 31.2.

Finding: EU ID 4 is dual-fired (fuel gas and liquid gas) and is the only unit subject to this requirement. CPAI submitted fuel sulfur quarterly summary reports for EU ID 4. During the evaluation period, the total duration of excess emissions was zero hours.

In Compliance

5. **Performance (Source) Tests**
The Permittee shall conduct source tests according to the applicable requirements of 40 C.F.R. 60.8 and Section 6 of this permit on any affected facility at such times as may be required by EPA, and shall provide the Department and EPA with a written report of the results of the source test.

Finding: In the 2017 ACC, CPAI reported that this requirement was not triggered during the evaluation period.

In Compliance

6. **Good Air Pollution Control Practice (also included in 40 CFR 61 NESHAP Subpart A)**

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At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate EU IDs 1 through 5, 108, 109, 110, 313, 314, 519, 520, and 944 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspections of the affected emission units.

Finding: In the 2017 ACC, CPAI reported continuous compliance with this requirement.

In Compliance

7. **Credible Evidence (also included in 40 CFR 61 NESHAP Subpart A)**
For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of the standards set forth in Conditions 36, 38 and 39 nothing in 40 C.F.R. Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether EU IDs 1 through 5, 108, 109, 110, 519, and 520 would have been in compliance with applicable requirements of 40 C.F.R. Part 60 if the appropriate performance or compliance test or procedure had been performed.

Finding: In the 2017 ACC. CPAI reported continuous compliance with this requirement.

In Compliance

8. **Concealment of Emissions (also included in 40 CFR 61 NESHAP Subpart A)**
The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission, which would otherwise constitute a violation of a standard set forth in Conditions 36, 38, 39, 40, or 42. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged to the atmosphere, and the piecemeal carrying out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size.

Finding: In the 2017 ACC, CPAI reported continuous compliance with this requirement. In addition, concealment of emissions was not observed during the September 19, 2018 onsite inspection.

In Compliance

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9. **Visible Emissions MR&R Requirements for Flares**
At least once in every calendar month that EU IDs 415 and/or 416 operate, momentarily observe their exhaust during normal operation for indications of visible emissions (VE). Keep a log of the observations in accordance with Condition 36.3. Each observation may be made via remote video camera monitoring from the control room if an operator cannot see the flare's exhaust through a window or cannot go outside for safety or weather reasons to make observations.

Finding: In the 2017 ACC, CPAI reported continuous compliance with this requirement. On November 18, 2017 CPAI submitted a Permit Deviation for failing to conduct informal VE observations for EU IDs 415 and 416. See ***Section X(J) and XII*** for more information.

Out of Compliance with Condition 36.1 of Permit No. AQ0489TVP02 Rev. 1

B. NSPS Subpart Dc
At all times, including periods of startup, shutdown, and malfunction, for EU IDs 108 and 109, the Permittee shall not combust fuel oil that contains greater than 0.5 percent sulfur by weight.

Findings: During the evaluation period, CPAI submitted semiannual Subpart Dc reports to the EPA as required by Condition 37.3 of Permit No. AQ0489TVP02. When EU IDs 108 and 109 operated on fuel oil, the fuel oil sulfur content was less than 3 ppm. Therefore, the 0.5 percent sulfur by weight limit was not exceeded. ATSM D7039-07 was used to analyze the fuel oil sulfur content in accordance with Condition 37.1c of Permit No. AQ0489TVP02.

In Compliance

C. NSPS Subpart Ka
The Permittee shall not store in EU ID 944 a petroleum liquid with a true vapor pressure greater than 1.0 psia without first taking measures to comply with 40 C.F.R. 60.112a, §60.113a, and/or §60.115a, as applicable.

Findings: In the 2017 ACC, CPAI certified continuous compliance with this requirement.

In Compliance

D. NSPS Subpart Kb
The Permittee shall equip EU ID 945 with a closed vent system and control device. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background as determined by Method 21. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater.

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Findings: During the evaluation period, CPAI submitted semiannual NSPS Subpart Kb reports. The reports stated that no reportable flare outages occurred.

On July 30, 2018 CPAI submitted a letter stating "By this letter, ConocoPhillips Alaska, Inc. (CPAI) is providing confirming notification that the Title V Operating Permit for the Alpine CPF (permit no. AQ0489TVP02) was amended upon submittal of a minor modification application on November 27, 2017. A primary purpose of that application was to formally address the change in liquid contained in storage tank tag no. CF-T-51001, the resulting change in Subpart Kb applicability status for this tank, and removal of the tank from the operating permit. (A copy of the application was submitted to EPA at the time of submittal to the Alaska Department of Environmental Conservation.) As such, CPAI is no longer required to submit a semi-annual Subpart Kb flare pilot monitoring report for this tank at the Alpine CPF. The final required report was submitted to EPA on January 15, 2018 covering the period Jul 1 - Dec 31, 2017". This requirement is no longer included in AQ0489TVP02 Rev. 2.

Not Applicable

E. NSPS Subpart GG

1. NO_x Standard

The Permittee shall not allow the exhaust gas concentration of NOX from EU ID 1 to exceed 172 ppmvd at 15% O2 ISO; from EU ID 2 to exceed 168 ppmvd at 15% O2 ISO; from EU ID 3 to exceed 190 ppmvd at 15% O2 ISO; or from EU IDs 4 and 5 to exceed 18028 ppmvd at 15% O2 ISO.

Periodic Testing: For each turbine subject to Conditions 16 and/or 38, that operates for 400 hours or more in any consecutive 12-month period on a given fuel, the Permittee shall satisfy either Condition 38.1a(i) or 38.1a(ii).

For an existing turbine whose latest emissions source testing was certified as operating at less than or equal to 90 percent of the most stringent applicable limit shown in Conditions 16 and 38, the Permittee shall conduct subsequent source tests using approved reference methods by the schedule below:

Within 1 year of the effective date of this permit if the most recent source test or substitute source test for the affected unit occurred greater than four years prior to the effective date of this permit and the turbine operated 400 hours or more in any consecutive 12-month period ending during any of the 6 months that precede the permit effective date, or

For an existing turbine whose latest emissions source testing was certified as operating at greater than 90 percent of any of the applicable limits shown in Conditions 16 and/or 38, the Permittee shall conduct subsequent source tests using approved reference methods, annually until two consecutive tests show performance results certified at less than or equal to 90 percent of the most stringent of applicable limits of Conditions 16 and 38.

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Finding: EU IDs 1 – 5 operated for more than 400 hours per 12-consecutive months during the evaluation period. EU IDs 3, 4, and 5 had passing NOx source tests in June 2016. EU IDs 1 and 2 had passing NOx source tests in January 2017.

In Compliance

2. Sulfur Standard

The Permittee shall not allow the sulfur content of the fuel burned in EU IDs 1 through 5 to exceed 0.8 percent by weight.

Monitor the total sulfur content of the fuels being fired in EU IDs 1 through 5, except as provided in Conditions 39.1b and 39.1c. The sulfur content of the liquid and gaseous fuels must be determined using the total sulfur methods described in Conditions 39.1f(i) and 39.1f(ii), respectively. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight % (4000 ppmw), then the fuel gas sulfur content may be determined according to ASTM D4084-82, 94, D5504-01, D6228-98, or Gas Processors Association Standard 2377-86, which measure the major sulfur compounds.

Findings: The EPA approved custom fuel monitoring schedule dated June 30, 2005 stated that CPAI is not required to monitor gaseous fuel sulfur content under Subpart GG since the fuel combusted meets the definition of natural gas in 40 CFR 60.331(u). However, CPAI is required to determine the fuel gas sulfur content on a monthly basis for State Standards under Condition 14.6 of Permit No. AQ0489TVP02. See Section VI(C) for more details.

CPAI submitted monthly liquid fuel sulfur content analyses for EU ID 4 in each FOR during the evaluation period. EU ID 4 is the only unit that can burn both natural gas and liquid fuel. The monthly sampling plan is in accordance with Condition 41.1d(i)(c)(2) of Permit No. AQ0489TVP02 and the EPA approved custom fuel monitoring schedule. The highest liquid fuel sulfur content was less than 3 ppm. The approved methods ASTM 7039-07 or ASTM D2622 were used to determine liquid fuel sulfur content.

In Compliance

F. NSPS Subpart IIII

For EU ID 622 the Permittee shall purchase an engine certified by the engine manufacturer, operate and maintain the stationary CI ICE and control device (if applicable) according to the manufacturer's emission-related written instructions, and burn only ULSD fuel.

Findings: In the 2017 ACC, CPAI reported continuous compliance with this requirement.

In Compliance

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G. NESHAP Subpart A

The Permittee shall not operate EU IDs 313 and 314, subject to 40 C.F.R. 61, Subpart E, as stated in Condition 44, in violation of that standard, except under an exemption granted by the President under section 112(c)(2) of the Act.

Findings: In the 2017 ACC, CPAI reported continuous compliance with this requirement.

In Compliance

H. NESHAP Subpart E

The Permittee shall not cause or allow emissions to the atmosphere from sludge incineration plants (incinerators), EU IDs 313 and 314 to exceed 3.2 kg (7.1 lb) of mercury per 24-hour period. Monitoring shall consist of an annual compliance certification in accordance with Condition 84.

Findings: In the 2017 ACC, CPAI reported continuous compliance with this requirement.

In Compliance

I. NESHAP Subpart HH

For EU ID 842, the Permittee shall meet the requirements of 40 C.F.R. 63 Subpart HH by complying with the applicable requirements of Condition 53.

Findings: In the 2017 ACC, CPAI reported continuous compliance with this requirement.

In Compliance

J. NESHAP Subpart ZZZZ

For EU ID 622, the Permittee shall comply with 40 C.F.R. 63 Subpart ZZZZ by meeting the applicable requirements of 40 C.F.R. 60 Subpart IIII as outlined in Condition 40.

For EU IDs 211 and 621, existing non-emergency non-blackstart CI stationary RICE:

- Change the oil and filter every 1,000 hours of operation or annually, whichever comes first;
- Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary, and;
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

For EU ID 212 – existing black start CI stationary RICE, comply with the following:

- Change the oil and filter every 500 hours of operation or annually, whichever comes first;
- Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

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- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Note: Based on informal communication between the Department and US EPA, annual Subpart ZZZZ maintenance is required every 12 months, plus or minus one month.

Findings: EU ID 211 has air filter and belts/hoses inspected on a monthly basis. Oil and oil filter changes were conducted on October 28, 2018 at 3515 hours of operation. During the evaluation period, EU ID 211 had the required Subpart ZZZZ maintenance conducted on July 28, 2017 and January 21, 2018 at 3470 and 3481.3 hours, respectively.

EU ID 212 had the last required Subpart ZZZZ maintenance conducted on July 22, 2015 and August 10, 2016. During the evaluation period, EU ID 212 had the required maintenance conducted on July 1, 2017 and March 9, 2018 at 395.8 and 412 hours, respectively. Therefore, all required Subpart ZZZZ maintenance was conducted on schedule.

EU ID 621 had all the last required maintenance conducted on February 5, 2014. During the evaluation period, EU ID 621 had the required maintenance conducted on August 24, 2017 and March 11, 2018 at 233, and 242 hours, respectively. Therefore, all required Subpart ZZZZ maintenance was conducted on schedule.

EU ID 622 had an oil analysis conducted on August 26, 2017 and March 9, 2018. Maintenance was performed on August 24, 2017 and March 11, 2018 at 113.2 and 122 hours, respectively.

In Compliance

K. NESHAP Subpart CCCCCC

1. General Operation and Maintenance Requirements

At all times, operate and maintain EU ID 947, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of EU ID 947.

2. Emissions Management Practices

Do not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following as described in Conditions 47.2a – 47.2d of Permit No. AQ0489TVP02 Rev. 2.

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3. **Reporting**
   Notify the Department per Condition 82 of any deviation from the requirements in Conditions 47.1 through 47.3.

   Finding: In the 2017 ACC, CPAI reported continuous compliance with this requirement and stated that a report was not required to be submitted during the evaluation period. No malfunctions occurred.

   In Compliance

L. 40 CFR 60 Subpart O

To avoid classification as 40 CFR 60, Subpart O applicable emission units, EU IDs 313 and 314 are each limited to burn no more than 10 percent sewage sludge on a dry basis.

Findings: During the evaluation period, CPAI reported the percentages of dry sewage sludge incinerated at the facility. The highest percentage was less than 0.01%. Therefore, CPAI did not exceed the 10% limit.

In Compliance

M. 40 CFR 60 Subpart Ec

The Permittee shall limit each of the incinerators, EU IDs 313 and 314, to combust a fuel feed stream, 10 percent or less of the weight of which is comprised, in aggregate, of hospital waste and medical/infectious waste as measured on a calendar quarter basis.

Findings: During the evaluation period, CPAI reported the percentages of hospital/medical/infectious waste incinerated at the facility. The highest percentage was less than 0.01%. Therefore, CPAI did not exceed the 10% or less limit.

In Compliance

N. 40 CFR 62 Subpart III

The Permittee shall burn greater than 30 percent municipal solid waste or refuse-derived fuel as a percentage of all fuels and wastes burned in each of EU IDs 313 and 314.

Findings: During the evaluation period, CPAI submitted the percentages of municipal solid waste/refuse-derived fuel incinerated at the facility. The lowest percentage was 75%, which is greater than 30% as required.

In Compliance

O. 40 CFR 71 Subpart C

The Permittee shall connect the process vent from the glycol dehydration unit (EU ID 842) to a process natural gas line.

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Findings: In the 2017 ACC, CPAI reported continuous compliance with this requirement. The Department verified that the process vent from the glycol dehydration unit was tied in to a process natural gas line during the September 2, 2015 onsite inspection for the 2015 FCE.

In Compliance

P. 40 CFR 61 Subpart M

The Permittee shall comply with the requirements set forth in 40 C.F.R. 61.145 and 40 C.F.R. 61.150 of Subpart M and the applicable sections set forth in 40 C.F.R. 61, Subpart A and Appendix A.

Findings: In the 2017 ACC, CPAI reported continuous compliance with this requirement.

In Compliance

Q. 40 CFR 82 Subpart F

The Permittee shall comply with the applicable standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F. Applicable requirements include 40 C.F.R. 82.154, §82.156, §82.161, §82.162, and §82.166.

Findings: In the 2017 ACC, CPAI certified continuous compliance with this requirement.

In Compliance

VI. State Standards

A. Visible Emission Standards

1. Industrial Process and Fuel-Burning Equipment Visible Emissions

The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EU IDs 1 through 5, 106 through 110, 211, 212, 415, 416, 417, 518 through 520, 621, 622, heaters within EU ID 742, and 839 listed in Table A to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.

Findings: CPAI reported the following in each FOR submitted during the evaluation period:

- EU ID 1 had a Method 9 conducted on June 7, 2017 and May 23, 2018. The 6-min average opacity was 0%.
- EU ID 2 had a Method 9 conducted on June 6, 2017 and May 23, 2018. The 6-min average opacity was 0%.
- EU ID 3 had a Method 9 conducted on June 7, 2017 and May 23, 2018. The 6-min average opacity was 0%.

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- EU ID 106 had a Method 9 conducted on June 6, 2017 and May 23, 2018. The 6-min average opacity was 0%.

- EU ID 107 had a Method 9 conducted on June 6, 2017 and May 23, 2018. The 6-min average opacity was 0%.

- EU ID 108 had a Method 9 conducted on June 7, 2017 and May 23, 2018. The 6-min average opacity was 0%.

- EU ID 109 had a Method 9 conducted on June 6, 2017. The 6-min average opacity was 0%.

- EU ID 518 had a Method 9 conducted on June 7, 2017 and May 23, 2018. The 6-min average opacity was 0%.

- EU IDs 1 – 3, 5, 106, 107, 110, and 518 – 520 only burned fuel gas during the reporting period. Therefore, Method 9 observations were not required.

- EU IDs 211 – 212 and 621 – 622 did not exceed the calendar year operational threshold in Table C of Permit No. AQ0489TVP02 during the reporting period. Therefore, Method 9 observations were not required.

- EU IDs 4, 108, and 109 operated on fuel gas and liquid fuel during the reporting period. The units did not exceed 400 operational hours per calendar year burning liquid fuel. Therefore, Method 9 observations were not required.

- EU IDs 742 and 839 remained insignificant during the evaluation period because actual emissions were less than the thresholds of 18 AAC 50.326(e). Therefore, Method 9 observations were not required.

In Compliance

2. **Incinerator Visible Emissions**
The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EU IDs 313 and 314 to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.

Findings: Method 9 observations were conducted for EU ID 314 on June 21, 2018. The opacity did not exceed the 20 percent opacity limit.

In Compliance

3. **Visible Emissions Monitoring, Recordkeeping and Reporting for Liquid Fuel-Fired Emission Units**

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When required by Condition 1.3, or in the event of replacement during the permit term, the Permittee shall observe the exhaust of EU IDs 211, 212, 621, and 622, for visible emissions using the Method 9 Plan under Condition 3.1. The Permittee may, for each unit, elect to continue the visible emissions monitoring schedule in effect from the previous permit at the time a renewed permit is issued, if applicable.

Findings: CPAI certified in the FORs that no Method 9 observations were required during the evaluation period.

In Compliance

4. **Visible Emissions Monitoring, Recordkeeping and Reporting for Flares**
The Permittee shall observe one daylight flare event within 12 months after the preceding flare event observation or within 12 months after the permit effective date, whichever is later. If no flare event exceeds one hour within that 12-month period, then the Permittee shall observe the next daylight flare event.

Findings: A Method 9 observation was conducted for EU ID 416 on August 5, 2016. The last flare observations for EU IDs 415 – 417 were conducted in 2004 under Permit No. AQ0489TVP01. Permit No. AQ0489TVP01 only required six daylight flare events for each unit during the life of the permit. This requirement was satisfied during the life of Permit No. AQ0489TVP01. In addition, CPAI stated that during the evaluation period, EU ID 417 did not operate and there were no qualifying flare events for EU ID 415.

In Compliance

B. Particulate Matter Standards
The Permittee shall not cause or allow particulate matter emitted from EU IDs 1 through 5, 106 through 110, 211, 212, 415, 416, 417, 518 through 520, 621, 622, heaters within EU ID 742, and 839 listed in Table A, to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

Finding: During the evaluation period, Method 9 observations did not exceed the 20 percent opacity limit. Therefore, CPAI did not exceed the 0.05 grains per cubic foot limit.

In Compliance

C. Sulfur Compound Emissions Standards
The Permittee shall not cause or allow sulfur compound emissions, expressed as SO2, from EU IDs 1 through 5, 106 through 110, 211, 212, 415, 416, 417, 518 through 520, 621, 622, heaters within EU ID 742, and 839 to exceed 500 ppm averaged over three hours.

To ensure compliance with Condition 15, the Permittee shall comply with the liquid fuel sulfur content limit as required by Condition 20 (0.11 percent by weight) and fuel gas H2S content limit as required by Condition 21 (200 ppmv).

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Arctic Diesel Fuel: For liquid fuel from a North Slope topping plant, the Permittee shall obtain from the topping plan, the results of a monthly fuel sulfur analysis.

Other Fuel Oil: The Permittee shall comply with either Condition 14.3a or 14.3b for liquid fuel obtained from a third-party supplier.

Fuel Gas: The Permittee shall analyze a representative sample of the fuel gas burned by EU IDs 1 through 5, 106 through 110, 415, 416, and 518 through 520 at least monthly to determine the sulfur content using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

Finding: CPAI no longer uses arctic diesel fuel from the North Slope topping plant.

For other fuel oil, CPAI complied with Condition 14.3b and analyzed the fuel sulfur content on a monthly basis for the fuel storage tanks. The methods ASTM 7039-07 or ASTM D2622-10 were used to analyze the fuel sulfur content. The fuel sulfur content was less than 3 ppm during the evaluation period.

For fuel gas, CPAI submitted monthly H_2S fuel sulfur analyses during the evaluation period. The highest fuel gas sulfur content was 70 ppm in April 2018. CPAI used the approved Method ASTM 4810 to analyze the monthly fuel gas sulfur content.

CPAI reported that EU ID 417 did not operate during the effective period of Permit No. AQ0489TVP02.

In Compliance

VII. Title I Permit Limits

A. Best Available Control Technology (BACT)

The Permittee shall install emission or operational controls as BACT and limit emissions from EU IDs 1 through 5, as indicated in Table D below.

1. NO_X and CO Periodic Source Testing (EU IDs 1 – 3)

Conduct periodic NO_X and CO source tests on EU IDs 1 through 3 as stated in Conditions 16.2(a)(i)-(iii).

Finding: EU IDs 1, 2, and 3 had passing NOx and CO source tests on January 10-11, 2017, January 8-9, 2017, and June 5, 2016, respectively.

In Compliance

2. NO_X and CO Periodic Testing (EU IDs 4 and 5)

NOx: Conduct NOX emission source tests for each fuel type (rich fuel gas, liquid fuel as specified in Condition 16.2b(iii), and lean fuel gas as specified in Condition

16.2b(iv)) in accordance with Section 6 and the methodology and timeframe of Conditions 38.1 through 38.3.

CO: Conduct summer CO emission source tests while operating in low emissions mode and winter CO emission source tests in accordance with Section 6 and the methodology and timeframe of Conditions 38.1 through 38.3 as it would apply to CO. Determine the CO emission rate and concentration for each fuel type (rich fuel gas, liquid fuel as specified in Condition 16.2b(iii), and lean fuel gas as specified in Condition 16.2b(iv)), using exhaust properties determined by both Method 19 and exhaust gas measurements.

Finding: Passing NOx and summer CO source tests were conducted on EU IDs 4 and 5 on June 7-8, 2016 and June 6-7, 2016, respectively.

Passing winter CO source tests for EU IDs 4 and 5 were conducted on January 14, 2017 and January 12, 2017, respectively.

In Compliance

3. **SO_2 (EU IDs 1 – 3)**
For EU IDs 1 through 3, monitor, record, and report in accordance with Conditions 15.6 through 15.8 to demonstrate compliance with the short-term BACT SO2 limit in Table D.

Finding: See ***Section VI(C)*** for compliance determination with Conditions 15.6 – 15.8 of Permit No. AQ0489TVP02. CPAI submitted a permit deviation on August 27, 2017 for failing to monitor the fuel gas sulfur content in July 2017. The permit deviation and the 2017 ACC reported Condition 15.2c of Permit No. AQ0489TVP02 Rev. 1 as out of compliance.

Out of Compliance with Condition 15.2(c) of Permit No. AQ0489TVP02 Rev. 1

4. **PM (EU IDs 1 – 3)**
Conduct annual visible emission observations, the first to be completed within 12 months of the effective date of this permit to demonstrate compliance with the short-term turbine BACT PM (opacity) emission limit in Table D. The observations shall be conducted as specified by 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations.

Finding: EU IDs 1 – 3 had visible emission observations conducted on June 6-7, 2017 and May 23, 2017. The opacity did not exceed the emission limits in Table D of Permit No. AQ0489TPV02 Rev. 1 (10% opacity for greater than three minutes in any one hour while fired on natural gas).

In Compliance

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5. **Annual CO BACT Limits (EU IDs 1 – 3)**
For EU IDs 1 through 3, to demonstrate compliance with the annual (12-month rolling) CO BACT emission limits in Table D, monitor, record, and report as described in Conditions 16.4(a)-(e) of Permit No. AQ0489TVP02 Rev. 2.

Finding: CPAI submitted monthly and consecutive 12-month summation of CO emissions for EU IDs 1 – 3 in each FOR during the evaluation period. The CO emissions for each unit did not exceed the CO emission limits listed in Table D of.

In Compliance

6. **CO BACT Low Load Operational Restrictions (EU IDs 1 – 3)**
The Permittee shall limit low-load operation of EU IDs 1 – 3 and document such operations as described in Condition 16.6(a)-(d) of Permit No. AQ0489TVP02 Rev. 2.

Finding: In the 2017 ACC, CPAI certified continuous compliance with this requirement. In addition, each FOR submitted under Permit No. AQ0489TVP02 stated that there were no process upsets that resulted in low load operation.

In Compliance

7. **NO_x BACT Operational Requirements (EU IDs 4 and 5)**
The Permittee shall operate EU IDs 4 or 5 out of low emissions mode17 for no more than 48 hours in any consecutive 12-month period. The following operating times out of low emissions mode do not count toward the 48 hour limit during transient operations of startup and shutdown of EU IDs 2, 4, or 5, turbine intake temperatures less than 0°F, periods of emission testing, and periods when EU ID 4 or 5 operates in lead (isochronous) mode due to EU ID 2 being out of service.

Finding: During the evaluation period, CPAI submitted the monthly and consecutive 12-month total time that each of EU IDs 4 and 5 operated out of low emissions mode. The total time operated out of low emissions mode in any consecutive 12-month period did not exceed 48 hours.

In Compliance

8. **Predictive Correlation Method**
If required by Condition 16.7g or elected under Condition 15.4d(ii), the Permittee shall develop a predictive correlation between NOx and CO emission rates from stack tests and turbine process parameters as described in Conditions 16.8a(i) – 16.8a(iii) of Permit No. AQ0489TVP02 Rev. 2.

Finding: CPAI developed predictive emissions correlations in 2005 during the preparation of the application to revise the CO BACT limits established under Permit No. AQ0489CPT08. The predictive emissions correlations were incorporated into Permit No. AQ0489MSS03 in April 2012.

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In Compliance

9. **Relative Accuracy Test Procedures for NO_x or CO**
The Permittee shall determine the Relative Accuracy (RA) of all correlations developed and approved under Condition 16.8a annually as described in Conditions 16.8b(i) – 16.8b(iv) of Permit No. AQ0489TVP02 Rev. 2.

Finding: EU ID 1, 2, and 3 had a CO RM stack test conducted on October 1-2, 2017. This date fulfills the agreement between CPAI and ADEC with the source test extension for EU ID 3.

In Compliance

10. **CO BACT Operational Requirements (EU IDs 4 and 5)**
Except during startup, shutdown, and periods of required emission testing, limit operation of EU IDs 4 and 5 at less than 45 percent load to no greater than 316 combined hours in any 12 consecutive months.

Finding: CPAI submitted the 12-month rolling operating hours at less than 45 percent load for EU IDs 4 and 5 with each FOR during the evaluation period. The hours did not exceed the combined 316-hour limit.

In Compliance

B. BACT Controls and Emission Limits for Heaters EU IDs 106 – 109, 518, and Glycol Boiler EU ID 839
The Permittee shall install emission or operational controls as BACT and limit actual emissions from the heaters, EU IDs 106 through 109, 518, and glycol boiler EU ID 839, as indicated in Condition 17, Table E of Permit No. AQ0489TVP02 Rev. 2.

1. **Short-Term BACT Limits**
For EU IDs 106 – 109 and 518, to demonstrate compliance with short-term NOx, CO, SO_2, and PM/opacity BACT limits in Table E, monitor, record, and report as follows:

NOx and CO: Conduct NOx and CO source tests on EU ID 106 or 107, EU ID 108 or 109 while fired on fuel gas, and EU ID 518, and record and report results in accordance with Section 6. Conduct each set of tests within 12 months after the permit effective date and once every five years thereafter.

For duel-fired EU IDs 108 and 109, conduct NOx and CO liquid fuel emission source tests on either EU ID 108 or 109 within 12 months of exceed 400 unit-hours of operation in a calendar year on liquid fuel.

Finding: Passing NOx and CO source tests were conducted on EU IDs 107, 108, and 518 on January 17, 2017, January 8, 2017, and January 18, 2017, respectively. EU IDs 108 and 109 did not exceed 400 operating hours in a 12-month period on

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liquid fuel during the evaluation period. Therefore, NOx and CO source tests on EU IDs 108 and 109 while operating on liquid fuel were not required.

In Compliance

SO_2: For EU IDs 106 – 109 and 518, monitor record, and report in accordance with Conditions 14.6 – 14.8 to demonstrate compliance with the short-term BACT SO_2 limit in Table E.

Finding: See ***Section VI(C)*** for compliance determination with Conditions 14.6 – 14.8 of Permit No. AQ0489TVP02. CPAI submitted a permit deviation on August 27, 2017 for failing to monitor the fuel gas sulfur content in January 2017. The permit deviation and the 2017 ACC reported Condition 16.2b of Permit No. AQ0489TVP02 as out of compliance.

Out of Compliance with Condition 16.2(b) of Permit No. AQ0489TVP02

PM – Fuel Gas Firing EU IDs 106 – 109 and 518: Conduct annual visible emission observations, the first to be completed within 12 months of the effective date of this permit to demonstrate compliance with the short-term heater BACT PM emission limit in Table E that applies when firing on fuel gas. The observations shall be conducted as specified by 40 CFR 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations.

PM – Backup Liquid Fuel (EU IDs 108 and 109): If operation on backup liquid fuel occurred during the period covered by the report, the Permittee shall monitor, record, and report according to Condition 13 to demonstrate compliance with the short-term heater BACT PM limit in Table E that applies when these units are fired on backup liquid fuel.

Finding: Annual visible emission observations were conducted for EU IDs 106 -109 on June 6, 2017, June 7, 2017 and May 23, 2018. An annual visible emission observation for EU ID 518 was conducted on June 7, 2017 and May 23, 2018. The opacity limits listed in Table E of Permit No. AQ0489TVP02 Rev. 1 were not exceeded during the evaluation period.

EU IDs 108 and 109 did not exceed 400 unit-hours of operation in a calendar year on liquid fuel. Therefore, the limits listed in Table E of Permit No. AQ0489TVP02 Rev. 1 and Rev. 2 were not exceeded during the evaluation period.

In Compliance

C. BACT Controls and Emission Limits for Engines (EU ID 211)

The Permittee shall install emission or operational controls as BACT and limit actual emissions from diesel fuel-fired engine, EU ID 211, as indicated in Table F of Permit No. AQ0489TVP02 Rev. 2.

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NO_X: Monitor compliance with the short-term NOX and CO BACT emission limits in Table F by conducting NOX and CO source tests in accordance with Section 6 within 12 months after the effective date of this permit and within 12 months of any subsequent operation of 400 hours or more in a consecutive 12-month period unless the latest test results were less than or equal to 90 percent of the applicable limits in Table F and it has been less than four years since the latest source test on this unit.

SO_2: Report in accordance with Condition 82 should emissions of any air pollutant exceed the emissions limit for that pollutant in Table F.

Finding: CPAI conducted a passing NO_X and CO source test on EU ID 211 on January 18, 2017.

In Compliance

D. BACT Controls and Emission Limits for Flares (EU IDs 415 and 416)

The Permittee shall design, install and operate flares, EU IDs 415 and 416, to be smokeless to meet the requirements of 40 C.F.R. 60.18. To comply with the Flare BACT in Condition 19, EU IDs 415 and 416 shall be designed for and operated with no visible emissions except for periods not to exceed a total of 5 minutes during any two consecutive hours and except for periods of startup, shutdown, or malfunction as defined in 40 C.F.R. 60.2.

1. **Monitoring – Visible Emissions**
   At least once in every calendar month that EU IDs 415 and/or 416 operate, momentarily observe their exhaust during normal operation for indications of visible emissions (VE). Keep a log of the observations in accordance with Condition 19.4. Each observation may be made via remote video camera monitoring from the control room if an operator cannot see the flare's exhaust through a window or cannot go outside for safety or weather reasons to make observations.

2. **Method 22 VE Observations**
   If visible emissions are observed at any time during normal flaring operation of EU IDs 415 and/or 416 and are present continuously for more than two (2) minutes, the Permittee shall conduct a visible emission (VE) evaluation in accordance with 40 C.F.R. 60 Appendix A, Method 22. The Method 22 VE observation period shall not be less than 2-hours in duration, sufficient to document a violation of Condition 19. Observation of the flare may be postponed for safety or due to weather reasons. If visible emissions are noted for a total of more than 5 minutes during the Method 22 VE observation follow 19.3(a)-(d).

3. **Recordkeeping**
   For observations of visible emissions per Condition 19.2 and for any Method 22 observations per Condition 19.3, record the following information in a written log for each observation of EU IDs 415 and 416 as stated in 19.4(a)-(f).

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4. **Reporting – Excess Emissions and Permit Deviations**
   In accordance with Condition 82 report excess emissions or permit deviations for failure to conduct monitoring or recordkeeping per Conditions 19.2 through 19.4, when the flare's exhaust is visible for more than a total of five minutes during any two consecutive hours, except during startup, shutdown or malfunction.

5. **Reporting – Operating Report**
   Submit with the operating report required under Condition 83 for the period covered by the report copies of records required under Conditions 19.3© and 19.4 and the dates that informal VE observations per Condition 19.2 were made and the dates, if any, that a Method 22 VE per Condition 19.3 was observed.

Finding: Informal Visible Emission Observations have occurred every month during the evaluation period except November 2017. CPAI submitted a permit deviation on November 18, 2017. See ***Section X(I)*** for more information.

Out of Compliance with Condition 36.1 of AQ0489TVP02 Rev. 1

E. Fuel Gas and Fuel Oil Sulfur Content Limits

1. **Fuel Oil Sulfur Content Limits**
   The Permittee shall limit fuel oil with a sulfur content not to exceed 0.11 percent by weight in any liquid or dual fired emission unit listed in Table A, except EU ID 622. To demonstrate compliance with the fuel oil sulfur content limit in Condition 20, the Permittee shall monitor, record and report according to Condition 15.2 or 15.3 and 15.5 of Permit No. AQ0489TVP02 Rev. 2.

   Finding: During the evaluation period, ULSD did not exceed 0.11 percent by weight fuel sulfur content listed in Table F. The highest fuel sulfur content was less than 3 ppm. See ***Section VI(C)*** for more information.

   In Compliance

2. **Fuel Gas H_2S Content Limits**
   The Permittee shall limit fuel gas with a hydrogen sulfide concentration not to exceed 200 ppmv at standard conditions in any fuel gas fired emission unit listed in Table A. To demonstrate compliance with the fuel gas H2S content limit in Condition 21, the Permittee shall monitor, record and report according to Conditions 15.6 through 15.8 of Permit No. AQ0489TVP02 Rev. 2.

   Finding: During the evaluation period, the hydrogen sulfide concentration did no exceed 200 ppmv. The highest H_2S fuel sulfur content was 55 ppmv. However, CPAI submitted a permit deviation on August 27, 2017 for failing to monitor the fuel gas sulfur content in January 2017. The permit deviation and the 2017 ACC reported Condition 20.1 of Permit No. AQ0489TVP02 Rev. 1 as out of compliance.

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Out of Compliance with Condition 20.1 of Permit No. AQ0489TVP02 Rev. 1

F. Owner Requested Limits and Limits to Protect Ambient Air Quality Standards and Increments

1. Operating Limits

The Permittee shall operate EU IDs 4, 108, 109, 211, 212, 313, 314, 417, 742, and 743 according to the operating limits indicated in Table G located in Condition 22 of Permit No. AQ0489TVP02 Rev. 2.

Finding: In the 2017 ACC, CPAI certified continuous compliance with this requirement.

In Compliance

2. Hours of Operation MR&R for Fuel-Fired Emission Units

The Permittee shall monitor, record, and report the total (emergency and non-emergency) hours of operation as described in Conditions 23.1 through 23.7 of Permit No. AQ0489TVP02 Rev. 2.

Finding: In the 2017 ACC, CPAI certified continuous compliance with this requirement.

In Compliance

3. Fuel Consumption Monitoring and Reporting

The Permittee shall monitor fuel consumption and operations for each of EU IDs 1 through 5, 106 through 110, 211, 212, 313, 314, 415, 416, 417, 518 through 520, 621, 622, 742, 743, and 839 as necessary to report the information required in Conditions 24.1 through 24.6. The fuel use may be estimated by measurement techniques and calculations approved by the Department.

Finding: In the 2017 ACC, CPAI certified continuous compliance with this requirement.

In Compliance

VIII. Public Complaints

According to ADEC's complaint automated tracking system, the Department has not received any complaints during the period of this review.

IX. Records Research

On December 4, 2018, ADEC requested the following information from the stationary source in accordance with 18 AAC 50.200 in order to complete this compliance evaluation.

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1. Review and make corrections as necessary to the attached Emission Unit Inventory form.

   Response: CPAI is providing the Emission Unit Inventory list that is in the current permit revision. See Attachment 1.

2. Review and, if needed, correct the attached Contact Information form. If a role holder is no longer in that position, please give an approximate end date.

   Response: Sam Widmer is no longer a contact as of 1 June 2018 and was replaced with Sarah Byam as of 1 November 2018.

3. State what ASTM Method(s) were used to determine the monthly fuel gas H2S contents that were submitted with each operating report.

   Response: Monthly fuel gas H2S content is completed using ASTM D4810-06.

4. Provide a summary of 40 CFR 63 NESHAP Subpart ZZZZ applicability and compliance status for EUs 211, 212, and 621. In addition, please fill out the attached Maintenance Summary Form for the period 1 July 2017 to 31 December 2018 and submit records that reflect the maintenance listed in the form.

   Maintenance Summary Form was not attached; therefore, a similar form was created based on previous requests. EU IDs 211, 212, and 621 are still applicable to NESHAP Subpart ZZZZ and in compliance. See Attachment 2 for records of applicable maintenance.

5. Provide 2017 and 2018 calendar total operational hours for EUs 211, 212, 621, and 622.

   Response:

	211	212	621	622
2017	29.4	18.2	19.3	18.3
2018	44.9	20.6	151.2	151.5

6. Provide 2017 and 2018 calendar total operational hours for EUs 4, 108, and 109 when operating on liquid fuel.

   Response:

	4	108	109
2017	13.9	0.417	0.083
2018	68.3	9.8	0.0

7. On 16 January 2018 CPA/ submitted a Permit Deviation regarding missed Visible Emission Observations for the flares. As a Corrective Action CPA/ stated that the monthly reminders would be set up for the next 3 years. Please confirm the monthly reminders have been set up as stated in the PD.

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Response: A monthly task to complete an emission observation of the flares has been put in place for the duration of the facility.

8. Condition 15.8(a)(v) requires the Permittee to include copies of the QA procedures in the operating report required by Condition 85. Does CPA/ have a timeframe of when this will be completed?

Response: In the current revision of the permit, Condition 16.8(a)(v) is the requirement to include copies of the QA procedures in the operating report required by Condition 83. QA procedures are expected to be completed roughly on 30 June 2019.

X. Reports Reviewed

G. Operating Reports

Condition 83 of Permit No. AQ0489TVP02 Rev. 2 (Condition 82 of Permit No. AQ0489TVP02 Rev. 1) requires submittal of a semiannual operating May 15 for the period January 1 to March 31, by August 15 for the period April 1 to June 30, by November 15 for the period July 1 to September 30, and by February 15 for the period October 1 to December 31 of the previous year. ADEC has received and reviewed the following operating reports for the period of this review:

Reporting Period	Date Submitted	Compliance Status
April 1 – June 30, 2017	July 30, 2017	**In Compliance**
July 1 – September 30, 2017	October 14, 2017	**In Compliance**
October 1 – December 31, 2017	February 8, 2018	**In Compliance**
January 1 – March 31, 2018	May 14, 2018	**In Compliance**
April 1 – June 30, 2018	August 15, 2018	**In Compliance**
July 1 – September 30, 2018	November 15, 2018	**In Compliance**
October 1 – December 30, 2018	February 13, 2019	**In Compliance**

H. Annual Compliance Certifications

Condition 84 of Permit No. AQ0498TVP02 Rev. 2 (Condition 83 of Permit No. AQ0489TVP02 Rev. 1) requires submittal of an annual compliance certification to ADEC and EPA by March 31 of each year. ADEC has received and reviewed the following annual compliance certification reports for the period of this review:

Reporting Period	Date Submitted	Compliance Status
January 1 – December 31, 2017	March 29, 2018	**In Compliance**

I. Excess Emissions

Condition 82 of Permit No. AQ0489TVP02 Rev. 2 requires the Permittee to report all emissions or operations that exceed or deviate from the requirements of this permit.

1. **Date of Event:** February 8, 2017 3:23 am to 6:55 am
   Date of Discovery: February 12, 2018

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Date Submitted: February 13, 2018
Duration: 3 hours 32 minutes
EU ID 1
Condition: 15.6(a), 15.6(d), 85.1, 85.2, and 95
Permit No. AQ0489TVP02 Rev. 1
Cause: A fuel nozzle on C1 cracked, requiring shutdown and repair. During the restart phase, startup issues were encountered causing low load to exceed the 90-minute limit. Everything was done to C1 to bring it back online and out of low load mode as quick as possible. Low load was extended due to the low gas injection system supply, Basically, CPAI had to re-inventory the field wide injection gas system while bringing it out of low load.
Corrective Actions: CPAI will update alerts on C1 to ensure they are sent in a timely manner.
Unavoidable: Yes
Assert Affirmative Defense of 8 AAC 50.235: Yes
Explanation of Unavoidable Event: CPAI could not have shortened the low mod duration for C1 since it is dependent on the field wide injection gas system.

J. Permit Deviations

Condition 82 of Permit No. AQ0489TVP02 Rev. 2 requires the Permittee to report all emissions or operations that exceed or deviate from the requirements of this permit.

1. **Date of Event:** July 1, 2017 – July 31, 2017
   Date of Discovery: August 8, 2017
   Date Submitted: August 27, 2017
   Duration: 31 days
   EU ID 1 - 20
   Condition: 14.6(a), 15.2(c), 16.2(b), and 20.1
   Permit No. AQ0489TVP02 Rev. 1
   Cause: A monthly H2S sample of the fuel gas was not collected in July 2017. Two samples were collected in June and none were collected in July because the automated reminder was incorrectly set. The second June sample was collected June 30 at 11:30 pm.
   Corrective Actions: The monthly reminder to collect the sample will be adjusted so that it will not notify the operators until it is the appropriate month.
   Notes: Based on the H2S analysis results since January 2017 as presented in the 2nd quarter 2017 FOR for the Alpine Processing Facility, the H2S content of the fuel gas has been between 40 and 55 ppm, in compliance with the 200 ppmv permit limit. CPAI has taken appropriate corrective actions to prevent similar violations.

2. **Date of Event:** September 1, 2017 – September 30, 2017
   Date of Discovery: November 8, 2017
   Date Submitted: November 18, 2017
   Duration: 30 days
   EU ID 416
   Condition: 36.1, 84.1(c)(i) and 95

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Permit No. AQ0489TVP02 Rev. 1
Cause: During the month of September, when the monthly reminder initiated the informal VE observations of EU IDs 415 and 416, the LP flare was down for maintenance. The monthly PM was completed on the 28th which did not allow the operator to conduct a VE observation on the LP Flare before the end of the month.
Corrective Actions: The monthly reminder to view the flares for visible emissions has been adjusted to occur on the 5th of the month. The reminder text has been revised to ensure the operators are aware that they will need to observe the flares for visible emissions once a month. If a flare is down for service, once the flare is back online during the month the operator will view the flare for visible emissions.
Notes: Joseph Morris spoke with Sam Widmer on the phone, no VE readings of EU IDs 415 and 416 because they were down for maintenance.

3. **Date of Event:** November 1, 2017 – November 30, 2017
Date of Discovery: January 12, 2018
Date Submitted: January 16, 2018
Duration: 30 days
EU ID 415 and 416
Condition: 36.1, 84.1(c)(i) and 95
Permit No. AQ0489TVP02 Rev. 1
Cause: The monthly reminder to view flares for visible emissions was manually adjusted to occur early in the month in case the flare is down for maintenance. The reminder was updated on November 11th, before the original PMO had a chance to generate on November 20th. Therefore, no monthly reminder was generated, and no VE Observation was completed in November.
Corrective Actions: Confirmed the monthly reminders for the next 3 years are setup and this issue should not occur.
Notes: The Department confirmed CPAI had set up the monthly reminders for the next 3 years on January 3, 2019 in RSP to the FCE IR Letter.

4. **Date of Event:** August 15, 2017 – February 15, 2018
Date of Discovery: March 11, 2018
Date Submitted: March 23, 2018
Duration: 5 months
EU ID N/A
Condition: 84.1(c)(i), 85.1, 85.2 and 87.1
Permit No. AQ0489TVP02 Rev. 1
Cause: Copies of the NSPS Subpart OOOOa reports submitted to EPA on 6/20/17 and 11/20/17 should have been submitted with the 2nd and 4th quarterly Operating Reports, or provided to ADEC at the time of submittal to EPA. ADEC was not copied upon submittal to EPA and the quarterly Operating Reports submitted to ADEC on 7/30/17 and 2/8/18 did not include these NSPS reports.
Corrective Actions: The reporting procedure will be amended in process guidance documents to ensure that ADEC is copied on all NSPS and NESHAP notifications and reports at the time of submittal to EPA, or that these notifications/ reports are included in the corresponding Operating Report.

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Notes: See email from Sims Duggins with SLR. The report covered CD5 and CD3. CD5 is not included in the AQ0489TVP02 permit. CD3 is included in the permit, however the information submitted was for April 2017, out of the reporting period of September 18, 2015 - March 31, 2018. The report and permit deviation is in compliance.

K. Source Tests

1. Source Test Plans

Condition 74 of AQ0489TVP02 Rev. 2 requires the Permittee to submit a source test plan within 60 days after receiving a request under Condition 68 and at least 30 days before the scheduled date of any test unless the Department agrees in writing to some other time period.

Date Submitted: August 26, 2017
Date Required to be Submitted: September 1, 2017
Tentative Date of Source Test: September 30, 2017
EU IDs 1, 2 and 3
Findings: Source test plan was submitted on time.

In Compliance

2. 10-Day Source Test Notifications

Condition 75 of AQ0489TVP02 Rev. 2 requires the Permittee to submit a notification at least 10 days before conducting a source test.

Date Submitted: September 18, 2017
Date Required to be Submitted: September 19, 2017
Date of Source Test: September 29, 2017
EU IDs 1, 2 and 3
Findings: 10-Day notification was submitted on time.

In Compliance

3. Source Test Reports

Condition 76 of AQ0489TVP02 Rev. 2 requires the Permittee to submit a source test report within 60 days after completing a source test.

Date Submitted: November 21, 2017
Date Required to be Submitted: December 3, 2017
Date of Source Test: October 3-4, 2017
EU IDs 1, 2 and 3
Findings: The Source Test Report was in compliance with the Conditions outlined in Permit No. AQ0489TVP02 Rev. 1 and the reference methods.

In Compliance

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L. Federal Reports

- **NSPS Subpart Kb Semi-Annual Report.** January 1 through June 30, 2017. Submitted July 22, 2017. **In Compliance**
- **NSPS Subpart GG Quarterly Report.** April 1 through June 30, 2017. Submitted July 22, 2017. **In Compliance**
- **NSPS Subpart GG Semi-Annual Report.** July 1 through December 31, 2017. Submitted January 18, 2018. **In Compliance**
- **NSPS Subpart Kb Semi-Annual Report.** July 1 through December 31, 2017. Submitted January 15, 2018. **In Compliance**
- **NSPS Subpart Dc Semi-Annual Report.** July 1 through December 31, 2017. Submitted January 16, 2018. **In Compliance**
- **NSPS Subpart OOOOa Annual Report.** September 18, 2015 through March 31, 2017. Submitted March 23, 2018. **In Compliance**
- **NSPS Subpart OOOOa Annual Report.** April 1, 2017 through March 31, 2018. Submitted June 29, 2018. **In Compliance**
- **NSPS Subpart GG Semi-Annual Report.** January 1 through June 30, 2018. Submitted July 25, 2018. **In Compliance**
- **NSPS Subpart Dc Semi-Annual Report.** January 1 through June 30, 2018. Submitted July 25, 2018. **In Compliance**
- **NSPS Subpart Kb Notification.** January 1 through June 30, 2018. Submitted July 30, 2018. **In Compliance**
- **NSPS Subpart Dc Semi-Annual Report.** July 1 through December 31, 2018. Submitted January 24, 2019. **In Compliance**
- **NSPS Subpart GG Semi-Annual Report.** July 1, 2018 through December 31, 2018. Submitted January 24, 2019.

M. Other Reports

- **Source Test Extension Request.** Submitted April 5, 2017. The Source Test Extension was declined. **In Compliance**
- **30-Day Relative Accuracy Audit Test.** August 26, 2017. **In Compliance**
- **Off Permit Modification.** Submitted February 20, 2018. CPAI sent an Off Permit Modification to the Department notifying the applicability to NSPS Subpart OOOOa to CD2 and CD3 Drill Sites. **In Compliance**
- **Emission Fee Estimate.** Submitted March 29, 2018. **In Compliance**
- **Emission Inventory.** Submitted April 27, 2018. **In Compliance**
- **Other: EPA Response.** EPA responded to CPAI request for applicability determination of NESHAP Subpart HH. EPA determined NESHAP Subpart HH does apply. **In Compliance**
- **Test Deviation.** Submitted July 10, 2018. Test Extension was requested and denied. **In Compliance**
- **Change of Responsible Official.** Submitted August 30, 2018. Erik Keskula was added as an RO. **In Compliance**

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- **Change of Responsible Official.** Submitted September 24, 2018. Phillip Susen and John Hentges were added as ROs. **In Compliance**

XI. On-Site Visit

Inspector: Joseph Morris - EPS
May 17, 2018
Weather: Overcast, Approximately 31°F

I met Lynn DeGegore, Field Environmental Coordinator for CPAI at approximately 6:30 am on May 17, 2018. We proceeded to meet up with Robert Asher from CPAI who walked me through IP.21 their monitoring system that tracks fuel, flares, flows hours and scheduled maintenance. Mr. Asher explained IP.21 is the data base in which they are able to pull required reporting data for Operating Reports or Information Requests and tracking daily processes.

We then proceeded to meet Tony Jackson CPAI Alpine Process Engineer, who led us around to observe Emission Units:

ID	Tag No.	Source Description	Rating/size	Commenced Construction/ Startup/ Modification Date
Gas Turbines				
1	CF-C-33012-TB	N-P MS5382 Injection Turbine (Gas-Fired) (C1)	38,000 hp (ISO)	10/18/00
2	CF-G-70001	N-P PG5371 Generator Turbine (Gas-Fired) (E1)	26,300 kW (ISO)	09/03/00
3	CF-G-70002	N-P PGT10+Generator Turbine (Dual Fired) (E2)	11,270 kW (ISO)	02/23/01
4	CF-G-70300-TB	Solar Taurus 60S (Dual Fired) (S1)	5.5 MW	3/10/05
Heaters				
110	CF-U-68007-H1	ACX3 Hot Oil Heater (gas- Fired)	36.75 MMBtu/hr (Heat input, LHV)	2/17/05
Engines				
211	GF-G-70008	Cummins KTTA50-G2 V-16 Pad Back-up Generator (E8)	1,500kW	8/24/05
212	GF-G-70375	Detroit Diesel	600KW	5/12/05
Incinerators				
313	CF-U-59001A	EnerWaste BOS 3.5T Waste Incinerator	350 lb/hr	01/31/01
314	CF-U-59001B	EnerWaste BOS 3.5T Waste Incinerator	350 lb/hr	
Flares				
415	CF-X-35011	Corona HP Flare	261 Mscf/day[2, 3] (Max. flaring capacity)	10/17/00
416	CF-X-35012	Corona LP Flare	212 Mscf/day[2, 3] (Max. flaring capacity)	10/18/00

During the inspection, no visible emissions, leaks, odors or instances of poor maintenance were discovered. The inspection concluded at approximately 9:30pm.

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XII. Compliance Issues

According to Permit No. AQ0489TVP02 Rev. 1, AQ0489TVP02 Rev. 2, Minor Permit Nos. AQ0498MSS07, AQ0489MSS08 and Alaska Air Quality Control Regulations, the stationary source appeared out of compliance with the following during the period of this review:

Condition 14.2 (AQ0489TVP02 Rev. 1)	**For liquid fuel from a North Slope topping plant, the Permittee shall obtain from the topping plant the results of a monthly fuel sulfur analysis.**
Finding	On August 27, 2017 CPAI submitted a PD report indicating that a monthly H2S sample of the fuel gas was not collected in July 2017. According to the report, two samples were collected in June and none were collected in July because the automated reminder was incorrectly set. The second June sample was collected June 30 at 11:30 pm. CPAI stated the monthly reminder to collect the sample will be adjusted so that it will not notify the operators until it is the appropriate month. Based on the H2S analysis results since January 2017 as presented in the 2nd quarter 2017 FOR for the Alpine Processing Facility, the H2S content of the fuel gas has been between 40 and 55 ppm, in compliance with the 200 ppmv permit limit. CPAI has taken appropriate corrective actions to prevent similar violations.
Condition 14.6(a) (AQ0489TVP02 Rev. 1)	**The Permittee shall analyze a representative sample of the fuel gas burned by EU IDs 1 through 5, 106 through 110, 415, 416, and 518 through 520 at least monthly to determine the sulfur content using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1).**
Finding	See ***Section X(J)*** for PD submitted August 27, 2017 and Condition 14.2 for more information.
Condition 15.2(c) (AQ0489TVP02 Rev. 1)	**For EU IDs 1 through 3, monitor, record, and report in accordance with Conditions 14.6 through 14.8 to demonstrate compliance with the short-term BACT SO2 limit in Table D.**
Finding	See ***Section X(J)*** for PD submitted August 27, 2017 and Condition 14.2 for more information.
Condition 15.6(a) (AQ0489TVP02 Rev. 1)	**Do not operate EU ID 1 at less than 40 percent load except during start-up, shutdown, and process upsets and limit such operation to no more than 90 minutes per event.**

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Finding	On February 13, 2018 CPAI submitted a PD indicated that a fuel nozzle on C1 cracked, requiring shutdown and repair. During the restart phase, startup issues were encountered causing low load to exceed the 90-minute limit. CPAI stated everything was done to C1 to bring it back online and out of low load mode as quick as possible. Low load was extended due to the low gas injection system supply, Basically, CPAI had to re-inventory the field wide injection gas system while bringing it out of low load.
Condition 16.2(b) (AQ0489TVP02 Rev. 1)	**For EU IDs 106 through 109 and 518, monitor, record, and report in accordance with Conditions 14.6 through 14.8 to demonstrate compliance with the short-term BACT SO2 limit in Table E.**
Finding	See ***Section X(J)*** for PD submitted August 27, 2017 and Condition 14.2 for more information.
Condition 20.1 (AQ0489TVP02 Rev. 1)	**To demonstrate compliance with the fuel gas H2S content limit in Condition 20, the Permittee shall monitor, record and report according to Conditions 14.6 through 14.8.**
Finding	See ***Section X(J)*** for PD submitted August 27, 2017 and Condition 14.2 for more information.
Condition 36.1 (AQ0489TVP02 Rev. 1)	**At least once in every calendar month that EU IDs 415 and/or 416 operate, momentarily observe their exhaust during normal operation for indications of visible emissions (VE). Keep a log of the observations in accordance with Condition 36.3. Each observation may be made via remote video camera monitoring from the control room if an operator cannot see the flare's exhaust through a window or cannot go outside for safety or weather reasons to make observations.**
Finding	CPAI submitted a PD on November 18, 2017 stating during the month of September, when the monthly reminder initiated the informal VE observations of EU IDs 415 and 416, the LP flare was down for maintenance. The monthly PM was completed on the 28th which did not allow the operator to conduct a VE observation on the LP Flare before the end of the month. Joseph Morris spoke with Sam Widmer on the phone, no VE readings of EU IDs 415 and 416 because they were down for maintenance. CPAI stated the monthly reminder to view the flares for visible emissions has been adjusted to occur on the 5th of the month. The reminder text has been revised to ensure the operators are aware that they will need to observe the flares for visible emissions once a

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	month. If a flare is down for service, once the flare is back online during the month the operator will view the flare for visible emissions.
Condition 84.1(c)(i) (AQ0489TVP02 Rev. 1)	**within 30 days after the end of the month during which the excess emissions or deviation occurred, except as provided in Conditions 84.1c(ii) and 84.1c(iii); or**
Finding	See Condition 36.1, the PD submitted on November 18, 2017 should have been by October 30, 2017.
Condition 95 (AQ0489TVP02 Rev. 1)	**The Permittee shall comply with each permit term and condition.**
Finding	See previously listed Conditions.

XIII. Conclusion

As a result of ADEC's air quality full compliance evaluation conducted with an on-site visit, the Stationary source was found to be operating out of compliance with requirements of Permit No. AQ0489TVP02 Rev. 1 and Air Quality Control Regulations.